

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

UNITED STATES OF AMERICA

*

v.

* **Criminal No. WDQ-13-028**

JESSE EDWARD WILLIAMS, IV

*

* * * * *

UNOPPOSED MOTION TO MODIFY CONDITIONS OF PRETRIAL RELEASE

The defendant, Jesse Edward Williams, IV, by and through his attorneys, James Wyda, Federal Public Defender for the District of Maryland, and Katherine Tang Newberger, Assistant Federal Public Defender, hereby respectfully moves this Honorable Court to modify his conditions of pretrial release to permit him to travel out-of-state by car with his mother for performances of the play that she wrote. In support of his motion, Mr. Williams states:

1. Mr. Williams has been charged in a one-count indictment with interfering with a flight crew in violation of 49 U.S.C. § 46504. He had an initial appearance on a criminal complaint on December 19, 2012, at which time the Court imposed conditions of release, which were subsequently amended on December 20, 2012. Mr. Williams is scheduled for arraignment on Friday, January 25, 2013.

2. Pursuant to the Court's order setting conditions of release, Mr. Williams is not permitted to leave the state of Maryland.

3. Mr. Williams' mother, Crystal Bass, has written a play, "Ain't No Love Like a Mother's Love," which is having its theatrical debut on February 16, 2013, at the Temple Theater in Meridian, Mississippi. Performances are also scheduled for March in North Carolina and for June at the Lyric Opera House in Baltimore. Ms. Bass also hopes the play will be performed at additional

venues this spring.

4. The staging of her first play is a great triumph for Ms. Bass, and she would like to share it with her entire family. Her husband and mother are planning to attend the first performance, and she would like her son to attend as well.

5. Moreover, prior to this case, Ms. Bass had arranged for her son to learn lighting and sound production from the lighting and sound technicians staging her play. She had intended for her son to accompany her to all the performances of her play so that he could apprentice with the stage technicians. Ms. Bass is willing to drive to all venues, understanding that given the nature of her son's charges, he will not be permitted to fly on an airplane.

6. Accordingly, we request that the Court enter an order permitting Mr. Williams to travel out-of-state with his mother for performances of her play as long as he first obtains the advanced approval of Pretrial Services and all out-of-state travel is by car.

7. I have conferred with Assistant United States Attorney Gregory Welsh about this request, and he has stated that he defers to Pretrial Services' position on the requested change of conditions. This morning I spoke with Pretrial Services Officer Joseph Cruse, who stated that he does not object to the modification, as long as advanced approval of Pretrial Services is required and all travel is by car.

WHEREFORE, Mr. Williams requests that this Honorable Court modify his conditions of pretrial release to state that Mr. Williams is permitted to travel out-of-state with his mother for performances of her play as long as he first obtains the advanced approval of Pretrial Services and he travels by car.

Respectfully submitted,

JAMES WYDA
Federal Public Defender
for the District of Maryland

/s/

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